

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Case No. 2:20-CR-30
	:	
vs.	:	JUDGE GRAHAM
	:	
RADOSLAV BOEV,	:	
	:	
Defendant.	:	

**MOTION TO CONTINUE TRIAL AND DEADLINES**

Now comes the defendant, Radoslav Boev, through counsel, pursuant to 18 U.S.C. § 3161(h)(7)(A) and moves this Court to continue trial currently scheduled for December 7, 2020, for a period of at least 60 days. Additionally, the defendant moves to extend all other dates and deadlines listed in the scheduling Order, for a period of approximately 60 days.

There is a potential plea that could settle the case and time is needed to meet with Mr. Boev regarding the terms. Unfortunately, the challenges presented by the COVID-19 virus have negatively impacted counsel's ability to meet with Mr. Boev at the Butler County jail regarding the potential plea. The proposed plea agreement was sent to Mr. Boev for his review. Counsel recently received a letter from his client addressing concerns that he has about the content of the proposed plea agreement and requesting counsel to schedule a visit with him at the Butler County jail to review and discuss the proposed plea agreement.

Given the rising COVID-19 infection rates across the state of Ohio additional time is needed to meet with Mr. Boev to review and sign the plea agreement. Undersigned counsel submits that the requested extension would serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. §3161(h)(7)(A). Counsel has communicated with AUSA

Michael Hunter about the continuance request and he does not oppose the continuance of the trial and other dates.

Respectfully submitted,

DEBORAH L. WILLIAMS  
FEDERAL PUBLIC DEFENDER

/s/ George Chaney, Jr.  
George Chaney, Jr. (LA #22215)  
Assistant Federal Public Defender  
Federal Public Defender's Office  
10 West Broad Street, Suite 1020  
Columbus, Ohio 43215-3469  
(614) 469-2999  
[george\\_chaney@fd.org](mailto:george_chaney@fd.org)  
Attorney for Defendant Radoslav Boev

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was electronically served upon Michael Hunter, Assistant United States Attorney, Office of the United States Attorney, 303 Marconi Blvd., Suite 200, Columbus, Ohio 43215 this day of filing.

/s/ George Chaney, Jr  
George Chaney, Jr. (LA #22215)  
Assistant Federal Public Defender